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Class

[Additional Counsel on the next page]

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

**Paula Norton**, individually and on behalf  
of all similarly situated individuals,

Plaintiff,  
vs.

**Strategic Staffing Solutions-S3, L.L.C.**, a  
Florida limited liability company; **Cynthia  
J. Pasky**, an individual; and **Does 1-100**,  
inclusive;

Defendants.

Case No. 3:23-cv-06648-JSC

Assigned to Hon. Jacqueline Scott Corley

**UPDATED JOINT CASE  
MANAGEMENT STATEMENT**

**Date: July 25, 2024**

**Time: 1:30 p.m.**

**Place: via zoom**

Complaint Filed: November 7, 2023

Removal Date: December 28, 2023

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**TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

Per the Court's Order on May 30, 2024, Plaintiff Paula Norton ("Plaintiff") and Strategic Staffing Solutions-S3, L.L.C. and Cynthia J. Pasky (collectively "Defendants"), by and through their respective counsel of record, hereby submit the following Joint Statement in advance of the July 25, 2024 Status Conference:

**I. The Putative Class**

On June 26, 2024, Plaintiff filed her First Amended Complaint, which asserts claims on behalf of two classes:

(a) all non-exempt persons who worked at least one 3.5-hour shift, whether as a direct-hire or agency employee, for Defendants in the State of California from November 7, 2019 through trial (the "Non-Exempt Class"); and

(b) all persons who worked at least one 3.5-hour shift for Defendants and were classified as an exempt employee in the role of "sourcer," "consultant," or "recruiter" (or similar role) in the State of California from November 7, 2019 through trial (the "Exempt Class").

Defendants have agreed, for the purposes of mediation only, that the Classes are appropriately defined and that Plaintiff is an adequate representative and reserve all rights to challenge adequacy and the Class definitions should mediation not be successful.

**II. Mediation**

The Parties have also agreed to participate in private mediation with Judge Peter D. Lichtman (Ret.) from Signature Resolution with mediation to take place on September 6, 2024.

After additional meet and confer efforts, the Parties have also reached agreement on the scope of necessary pre-mediation discovery.

**III. Motion for Remand**

Based on the Parties meet and confer efforts, Plaintiff believes that there is not presently any basis to move for remand.

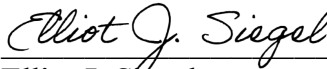
**IV. Other Issues**

The Parties respectfully request the Court set a further status conference for September

1 16, 2024 or the first available date thereafter, with the Parties to update the Court regarding  
2 settlement efforts at that time.

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4  
5 Dated: July 17, 2024


Respectfully submitted  
**KING & SIEGEL LLP**

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8 Elliot J. Siegel  
9 Attorneys for Plaintiff Paula Norton  
10 and The Putative Class

11 Dated: July 17, 2024

Respectfully submitted  
**LAW OFFICE OF XAVIER VILLEGAS, APC**

13 

14 Xavier Villegas  
15 Attorney for Plaintiff Paula Norton  
16 and The Putative Class

17 Dated: July 17, 2024

Respectfully submitted  
**FOLEY & LARDNER LLP**

20 /s/ Sara Abarbanel

21 Sara Abarbanel  
22 Jason Y. Wu  
23 Evan Hamling  
24 Kaleb N. Berhe  
25 Attorneys for Defendants Strategic Staffing  
26 Solutions-S3, L.L.C. and Cynthia J. Pasky  
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